ride the light SM

Qwest

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RECEIVED

FEB 28 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 28, 2001

Ms. Magalie Roman Salas
Secretary
Portals II, Room TW-A325
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Numbering Resource Optimization, CC Docket No. 99-200
Workpaper 3 of Appendix A to Comments of Qwest Corporation

Dear Ms. Roman Salas:

In connection with the Motion to Accept Appendix to Comments of Qwest Corporation ("Qwest"), filed on February 16, 2001, enclosed for filing is a replacement version of Workpaper 3. Qwest filed its Appendix as an attachment to the Comments to the Second Further Notice of Proposed Rulemaking, which were filed earlier in the above-captioned proceeding on February 14, 2001.

The initial version of Workpaper 3, filed with the Motion to Accept, and entitled Number Pooling IT Costs, inadvertently contained an annotation in the footer of the document that read "CONFIDENTIAL: Disclose and distribute solely to QWEST employees with a need to know." In actuality, this was not the confidential version of Workpaper 3 (the header was clearly marked "Non-Confidential"). (The confidential version of Workpaper 3 was submitted to the Office of the Secretary under separate cover, with a request that it (and the confidential version of Workpaper 2) be withheld from public inspection pursuant to either Section 0.457(d) or Section 0.459 of the FCC's rules on February 16, 2001.)

To avoid any further confusion and as a follow-up to the telephone inquiry from Cheryl Callahan of the FCC's staff, Qwest requests that the attached non-confidential version of Workpaper 3 (with the footer deleted) be substituted for the non-confidential version of Workpaper 3 that was included with the Appendix when it was initially filed.

Thank you for your assistance with this matter. If you have any questions regarding this correspondence, please call me.

Sincerely,

Kathryn Marie Krause

Kathryn Marie Krause

Encl.

c: Certificate of Service

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WORKPAPER 3

REDACTED - FOR PUBLIC INSPECTION

Number Pooling IT Costs
FCC Recoverable Costs - Non-Confidential
Total Costs

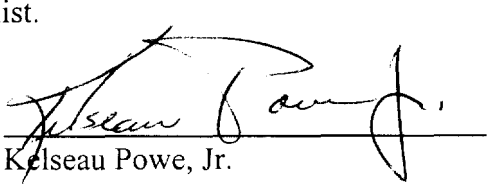
TYPE 1 and 2 COSTS:		2000		2001		2002		2003		2004		2005		2006		Total		
Project	Project Description	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Total
NP Systems Validation	The purpose of this project was to investigate current "classic" US West Systems of border town issues	1.3	5.2	-	-	-	-	-	-	-	-	-	-	-	-	1.3	5.2	6.5
Network IBM ISCP	Disk drives for Network ISCPs.	-	##	-	-	-	-	-	-	-	-	-	-	-	-	-	##	##
Management Team	Costs are associated with headcount required to support the Number Pooling Program Office (Director, Project Manager/Account Managers, Architects, Analyst, Program Manager, PMA and Finance Manager)	458.6	1,834.6	645.5	2,582.0	322.8	1,291.0	-	-	-	-	-	-	-	-	1,426.9	5,707.6	7,134.5
TNVU (TN Viewing Utility)	This project provides for TN utilization and forecasting data to support the associated business processes within the NSAC and Number Planning organizations.	9.2	236.7	208.0	1,232.0	286.7	-	286.7	-	286.7	-	286.7	-	286.7	-	1,650.8	1,468.7	3,119.5
Develop Block Verification Tools	This application identifies the status of TNs within the pooling designated blocks. Data from several Qwest systems is extracted and reported for further analysis by the NSAC.	4.5	18.2	44.2	176.6	-	-	-	-	-	-	-	-	-	-	48.7	194.8	243.5
Use of Pooled Numbers	This work includes making internal development changes to handle POOL FID and EXK in all the systems including the service order processors and Billing. IT estimates that over 30 internal systems will require changes to support the implementation of Number Pooling.	20.8	83.4	195.0	880.0	219.2	-	219.2	-	219.2	-	219.2	-	219.2	-	1,311.8	963.4	2,275.1
Autopopulate FID	This provides for the POOL FID and EXK to be automatically populated on all orders that contain pooled telephone numbers	-	-	950.0	3,800.0	570.0	-	570.0	-	570.0	-	570.0	-	570.0	-	3,800.0	3,800.0	7,600.0
Overall Billing Impacts	Thousands-Block Number Pooling involves allocation of blocks of sequential telephone numbers within the same NXX to different service providers and, potentially, to different switches which serve customers within the same rate area. All 10,000 numbers within each NXX continue to be assigned to one rate area, but are allocated among multiple service providers at the Thousands-Block (NXX-X) level. Thousands-Block Number Pooling is based on the LNP technology, which allows phone numbers to be ported between service providers within rate centers	-	-	1,877.5	7,965.7	-	-	-	-	-	-	-	-	-	-	1,877.5	7,965.7	9,843.2
Billing for Rating and Taxing	Additional EXK FID translations required within CRIS systems for Network Number Pooling. Need to identify the problem switches that cross NPA's. The NPA of the account can be used to determine whether to use the EXK provided or use a new translated EXK for rating and taxing(Eastern)	-	-	27.2	108.8	-	-	-	-	-	-	-	-	-	-	27.2	108.8	136.0
Interoperability Testing	This testing and deployment is a coordinated test that will run each scenario supported by Number Pooling through the systems in an end-to-end test (individual system tests are NOT sufficient when a large number of systems are impacted). This testing will be executed for each region that must roll out NP. Each region, while often using the same systems by name are not actually the same in terms of how data is handled. Therefore, a full test is required.	39.2	156.8	77.0	308.0	-	-	-	-	-	-	-	-	-	-	116.2	464.8	581.0
NPAC to ASMS Testing	This includes cost to support Industry NPAC v3.0 to ASMS v4.0 test, Internal Compliance Test, monitor the links to the NPAC, NPAC Correct and re-validate and to install and test future releases of the SOA/LSMS	-	-	4.4	17.6	-	-	-	-	-	-	-	-	-	-	4.4	17.6	22.0

Project	Project Description	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Total
NPAC Development& Administration	Qwest Cost Allocation was left flat at 30.89% during the 5 year period because modification of this allocation has not been finalized. Qwest anticipates that this allocation will be reduced to approximately 28% in 2001. TN Pooling Event estimates are based on Qwest's current requirement of 2.4M TNs per year. Volume is less in the earlier years because of the allowance for a six month inventory, and increases as Number Pooling implementation is expanded	-	-	##	-	##	-	##	-	##	-	##	-	##	-	##	-	##
ASMS Dual Footprint	4.0 of ASMS is in the only test environment we have for ASMS (a unique IBM platform). Number Pooling work for 3.1 of ASMS cannot use that platform for testing of any key features. We only have the production environment to test against therefore there is a need for another test environment for 3.1 testing	-	-	80.0	670.0	-	-	-	-	-	-	-	-	-	-	80.0	670.0	750.0
Cause Code 26	Misrouted call error handling - Allows Qwest to accommodate misrouted calls that are received by other networks providing the caller with an announcement that the dialed number has been ported and/or pooled. This new system must have the capability to synchronize data contained in CNUM, ASMS, SWITCH and the Network Element and provision that information in a trigger like mechanization through MARCH, so that the network has the intelligence to route misrouted calls. If we are unable to have access into Telcordia systems to effectively develop a system that supports Cause Code 26, then we will ask Telcordia to develop a solution, which will more than likely increase costs	-	-	##	##	##	##	##	-	##	-	##	-	##	-	##	##	##
LSS System work	The current LSS system is a discontinued BellCore product. Its basic design dates back to its predecessor, DIR/ECT, written by Bell Labs in the early 1970's. LSS is a table-driven system with over 30 tables used to populate and validate information going into the LSS database. The cornerstone of the LSS system is the Central Office/Exchange Table. This table provides the Numbering Plan Area (NPA), directory scoping/DA locality, default community, and various other information required by this system. The basic premise of the CO/EX table is Prefix, NPA, and exchange, if you know any two items you can derive the third. Local Number Portability (LNP) and Number Pooling make this premise invalid in the current business environment by breaking the link between NPA, NXX and Exchange. Pooled and ported listings must be scoped by where the service is being provided, by Service Address, regardless of what the Telephone number is. The inherent design of LSS does not allow this.	-	-	800.0	3,200.0	-	-	-	-	-	-	-	-	-	-	800.0	3,200.0	4,000.0
TNP Package	To successfully support Number Pooling, changes must be made to a variety of systems. Telcordia supplies software enhancements for a foundational set of systems that support service order flows, number assignments, provisioning and routing. These systems can not be modified by Qwest to support Number Pooling and therefore must be contracted with Telcordia	-	##	-	##	##	##	##	-	##	-	##	-	##	-	##	##	##
Telcordia Consultant	Telcordia Systems SME to support Number Pooling.	-	-	-	##	-	-	-	-	-	-	-	-	-	-	-	##	##
State Mandate	Develop tools and interim systems mechanization to support trial. Also provide resources and processes to support trial's manual workarounds.	15.1	-	1,808.6	-	-	-	-	-	-	-	-	-	-	-	1,823.7	-	1,823.7
Total TYPE 1 and 2 Costs		**548.8**	**7,374.8**	**8,233.0**	**26,172.7**	**4,164.2**	**7,291.0**	**3,108.0**	**-**	**3,231.7**	**-**	**3,348.3**	**-**	**3,402.5**	**-**	**26,036.5**	**40,838.6**	**66,875.1**

Project	Project Description	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Total
TYPE 3 COSTS:																		
DID Package	Mechanized the Porting In/Out of DID ranges. This package is important so that Qwest will accurately report to the FCC required Number Categories. The cost of this enhancement is expected to be offset by efficiencies in operation.	-	-	-	##	##	-	##	-	##	-	##	-	##	-	##	##	##
Total Costs		**548.8**	**7,374.8**	**8,233.0**	**28,172.7**	**4,264.2**	**7,291.0**	**3,208.0**	**-**	**3,331.7**	**-**	**3,448.3**	**-**	**3,502.5**	**-**	**26,536.5**	**42,838.6**	**69,375.1**

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on the 28th day of February, 2001, I have caused a hard copy of the foregoing **LETTER** to be served, via hand delivery, upon the persons/entity listed on the attached service list.



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